

# **Exhibit A-** **NFLPA-56**



**NFL PLAYERS**  
ASSOCIATION

**LEGAL DEPARTMENT**

August 25, 2017

Harold Henderson, NFL Hearing Officer

**VIA E-MAIL**

Dear Mr. Henderson:

As you are aware, on August 18, 2017, the NFLPA made a written request to the NFL for certain documents and witnesses. On August 22, 2017, the NFL responded in writing to our requests.

Certain of the requests and the NFL's answers to those requests appear below:

5. All Documents regarding the NFL's November 1, 2016 interview of Robert Tobias, including all transcripts and recordings (including, but not limited to, all audio, video, and digital recordings) of Mr. Tobias' interview, and all NFL investigative notes, memoranda or other Documents relating to Mr. Tobias' interview.

**Request No. 5:**

**There are no transcripts or recordings of the interview with Mr. Tobias. *See also* objections above.**

6. All Documents regarding the NFL's October 6, 2016, November 15, 2016, and April 7, 2017 interviews of Elaine Glenn, including all transcripts and recordings (including, but not limited to, all audio, video, and digital recordings) of Ms. Glenn's interviews, and all NFL investigative notes, memoranda or other Documents relating to Ms. Glenn's interviews.

**Request No. 6:**

**There are no transcripts or recordings of the interviews with Ms. Glenn. *See also* objections above.**

7. All Documents regarding the NFL's October 6, 2016 and October 13, 2016 interviews of Ayrin Mason, including all transcripts and recordings (including, but not limited to, all audio, video, and digital recordings) of Ms. Mason's interviews, and all NFL investigative notes, memoranda or other Documents relating to Ms. Mason's interviews.





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**Request No. 7:**

**There are no transcripts or recordings of the interviews with Ms. Mason. *See also* objections above.**

One of the NFL's experts in this matter, Dr. Lone Thanning, produced a report dated July 5, 2017. In that report, Dr. Thanning sets forth under "Document Examination" all of the documents she reviewed in rendering her opinion. Those documents include, among others, the following:

"Interview of Ayrin Mason, Friend of Tiffany (5 pages)"; "Interview of Elaine Glenn, Tiffany's Aunt (4 pages)"; "Interview of Assistant City Attorney Robert Tobias, Columbus, Ohio, City Attorney's Office (6 pages)." *See* Report at 1. I am attaching Dr. Thanning's report for your reference.

As the above demonstrates, the NFL's response to the NFLPA's requests was inaccurate, and we therefore request that you immediately order the NFL to produce the documents referred to in Dr. Thanning's report, which were clearly relied upon by the NFL, including its experts.

Very truly yours,

A handwritten signature in black ink, appearing to read "Heather M. McPhee".

Heather M. McPhee  
NFLPA Associate General Counsel

cc: Tom DePaso  
Jeffrey Kessler  
Ned Ehrlich